

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Case No. 25-cv-10676

**MOTION FOR LEAVE TO
APPEAR UNDER
PSEUDONYMS**

Plaintiffs respectfully move the Court to permit them to proceed in this action under pseudonyms. The grounds for this motion are set forth in the accompanying memorandum of law, complaint, and exhibits in support of the motion. A proposed order also accompanies this motion.

Respectfully submitted,

s/Tomás Arango

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** Application for admission pro hac vice forthcoming*

Dated: March 23, 2025

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I certify that, in accordance with Local Rule 7.1(a)(2), I emailed Rayford Farquhar, Deputy Chief, Civil Division and Chief, Defensive Litigation for the Civil Division of the United States Attorneys' Office for the District of Massachusetts on March 21, 2025 to advise him of the forthcoming litigation, including the instant motion, and in that email, I stated that Plaintiffs would disclose their identities to opposing counsel. I further stated that I would email him, or whomever he wished to designate, copies of Plaintiffs' filings after they were docketed, and that Plaintiffs would arrange for personal service on his office on Monday morning, March 24, 2025.

This communication was an attempt to resolve the issues raised in this motion. Mr. Farquhar has not yet responded to my email at the time of this filing and, therefore, the parties were unable to reach a resolution.

s/ Trina Realmuto
Trina Realmuto